

U.S. Department of Justice

Washington, DC 20530

**Amendment to Registration Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**

**INSTRUCTIONS.** File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

|                       |                     |
|-----------------------|---------------------|
| 1. Name of Registrant | 2. Registration No. |
| Venable LLP           | 5931                |

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To give a 10-day notice of change in information as required by Section 2(b) of the Act.

☒ To correct a deficiency in

☐ Initial Statement

☒ Supplemental Statement for the period ending 04/30/2018

☐ Other purpose (specify) \_\_\_\_\_

☐ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:

See attachment

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (If space is insufficient, a full insert page must be used.)

The responses to 14(a) and 15(a) in the Supplemental Statement filed for the period ending on 04/30/2018 inadvertently omitted certain payments Venable received from the Embassy of the State of Qatar as well as certain disbursements Venable made to other service providers on behalf of the Embassy of the State of Qatar.

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**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>1</sup>)

November 30, 2018

/s/ Andrew Bigart

eSigned

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<sup>1</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 04/30/2018**

**Response to 4(a)**

Venable LLP has more than 250 partners. From time to time, partners or similar officials join or leave the firm.

**Response to 4(b)**

Venable LLP has more than 250 partners. From time to time, partners or similar officials join or leave the firm.

**Response to 5(b)**

During the six-month reporting period, each of the following individuals (who were each already previously employed at Venable LLP), commenced registrable activities on behalf of a foreign agent:

| <i>Name</i>          | <i>Residence Address</i>                          | <i>Citizenship</i> | <i>Position</i>       | <i>Date Assumed</i> |
|----------------------|---|--------------------|-----------------------|---------------------|
| Loren Aho            | 3309 Cannongate #2<br>Fairfax, VA 22031           | USA                | Legislative Assistant | 02/13/2018          |
| Josh Finestone       | 8416 Culver Place<br>Alexandria, VA 22308         | USA                | Senior Policy Advisor | 02/05/2018          |
| David A. Mullon, Jr. | 1779 Crofton Parkway<br>Crofton, MD 21114         | USA                | Attorney              | 02/02/2018          |
| Robert L. Smith II   | 1117 10th Street NW, #701<br>Washington, DC 20001 | USA                | Senior Policy Advisor | 02/05/2018          |

**Response to 11**

During this six-month reporting period, certain individuals who filed Short-Form Registration Statements engaged in activities for or rendered services to Foreign Principals named in Items 7, 8, or 9 of this Supplemental Statement. The following identifies each Foreign Principal and describes in detail the Short Form Registrant's activities and services performed on their behalf. Here, the Hong Kong Trade Development Council is referred to as "HKTDC," the Kili/Bikini/Ejit Local Government Council is referred to as "KBE," and the Embassy of the State of Qatar is referred to as "Qatar."

| <i>Short Form Registrant</i>  | <i>Foreign Principal</i> | <i>Date</i> | <i>Contact Name</i> | <i>Position</i>                               | <i>Type of Contact</i> | <i>Subject matter</i>                  |
|-------------------------------|--------------------------|-------------|---------------------|---|------------------------|--|
| L. Aho, Legislative Assistant | Qatar                    | 2/6/18      | Cesar Gonzalez      | Chief of Staff, Congressman Mario Diaz-Balart | Email                  | Invite Member to attend CODEL in Qatar |

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| <b>Short Form Registrant</b>        | <b>Foreign Principal</b>  | <b>Date</b> | <b>Contact Name</b> | <b>Position</b>   | <b>Type of Contact</b> | <b>Subject matter</b>                  |
|-------------------------------------|---|-------------|---------------------|---|------------------------|--|
| L. Aho, Legislative Assistant       | Qatar   | 2/6/18      | Jennifer Nawrocki   | Legislative Director, Congressman John Rutherford                         | Email                  | Invite Member to attend CODEL in Qatar |
| L. Aho, Legislative Assistant       | Qatar   | 2/6/18      | James Walsh         | Legislative Director, Congressman Ted Yoho                                | Email                  | Invite Member to attend CODEL in Qatar |
| L. Aho, Legislative Assistant       | Qatar   | 2/6/18      | Mike Dankler        | Deputy Chief of Staff/Legislative Director, Congresswoman Jackie Walorski | Email                  | Invite Member to attend CODEL in Qatar |
| L. Aho, Legislative Assistant       | Qatar   | 2/6/18      | Faith Ammen         | Scheduler, Congresswoman Jackie Walorski                                  | Email                  | Invite Member to attend CODEL in Qatar |
| L. Aho, Legislative Assistant       | Qatar   | 3/1/18      | Cesar Gonzalez      | Chief of Staff, Congressman Mario Diaz-Balart                             | Email                  | Invite Member to attend CODEL in Qatar |
| J. Finestone, Senior Policy Advisor | Qatar   | 4/10/18     | Patrick Large       | Chief of Staff, Congressman Steven Palazzo                                | Phone Call             | Invite Member to attend CODEL in Qatar |
| J. Finestone, Senior Policy Advisor | Qatar   | 4/10/18     | John Donnelly       | Chief of Staff, Congressman Tom Graves                                    | Phone Call             | Invite Member to attend CODEL in Qatar |
| J. Finestone, Senior Policy Advisor | Qatar   | 4/10/18     | Tim Baker           | Chief of Staff, Congressman Rick Allen                                    | Phone Call             | Invite Member to attend CODEL in Qatar |
| J. Finestone, Senior Policy Advisor | Qatar   | 4/10/18     | Bruce Miller        | Chief of Staff, Mark Amodei   | Phone Call             | Invite Member to attend CODEL in Qatar |
| R. Hegg, Senior Policy Advisory     | Did not engage in reportable activities during this reporting period.   |             |                     |   |                        |  |
| D. Manchester, Counsel              | Did not engage in reportable activities during this reporting period, as applicable (per the response to Question 5(c), Ms. Manchester left Venable LLP on 11/28/2017). |             |                     |   |                        |  |

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| <i><b>Short Form Registrant</b></i> | <i><b>Foreign Principal</b></i> | <i><b>Date</b></i> | <i><b>Contact Name</b></i> | <i><b>Position</b></i>   | <i><b>Type of Contact</b></i> | <i><b>Subject matter</b></i>   |
|-------------------------------------|---------------------------------|--------------------|----------------------------|--|-------------------------------|--|
| D. Mullon, Jr., Partner             | KBE                             | 2/5/2018           | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Phone Call                    | Representation of KBE, and hearing re S. 2182 on 2/6   |
| D. Mullon, Jr., Partner             | KBE                             | 2/6/2018           | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Meeting                       | Brief post-hearing discussion to arrange meeting with KBE representatives on 2/8   |
| D. Mullon, Jr., Partner             | KBE                             | 2/7/2018           | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Email                         | Emails confirming time for meeting with KBE on 2/8   |
| D. Mullon, Jr., Partner             | KBE                             | 2/8/2018           | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Meeting                       | Attend meeting between KBE members and Committee staff to discuss KBE budget, financial plan for KBE projects, and the status of S. 2182 |
| D. Mullon, Jr., Partner             | KBE                             | 3/2/2018           | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Email                         | Inquiry about time for submitting additional comments for hearing record   |
| D. Mullon, Jr., Partner             | KBE                             | 3/12/18            | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Email                         | Email reply to committee staff's request for financial plan from KBE   |

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| <i><b>Short Form Registrant</b></i> | <i><b>Foreign Principal</b></i>   | <i><b>Date</b></i> | <i><b>Contact Name</b></i> | <i><b>Position</b></i>   | <i><b>Type of Contact</b></i> | <i><b>Subject matter</b></i>   |
|-------------------------------------|---|--------------------|----------------------------|--|-------------------------------|--|
| D. Mullen, Jr., Partner             | KBE   | 4/16/18            | Isaac Edwards              | Senior Republican Counsel Senate Committee on Energy and Natural Resources | Phone Call                    | Committee staff's request regarding budget documents or information from KBE |
| W. Nordwind, Partner                | Did not engage in reportable activities during this reporting period, as applicable (per the response to Question 5(c), Mr. Nordwind left Venable LLP on 12/31/2017). |                    |                            |  |                               |  |
| T. Quinn, Partner                   | Did not engage in reportable activities during this reporting period.   |                    |                            |  |                               |  |
| R. Smith, Senior Policy Advisor     | Qatar   | 03/01/18           | Ted Maness                 | Chief of Staff, Rep. Trent Kelly   | Email                         | Discussion regarding potential letter with MS delegation and Qatar           |
| R. Smith, Senior Policy Advisor     | Qatar   | 03/01/18           | Scott Luginbill            | Chief of Staff, Rep. Mark Walker   | Email                         | Discussion regarding potential MECEA travel to Qatar                         |
| R. Smith, Senior Policy Advisor     | Qatar   | 03/01/18           | Benjamin Falkowski         | Chief of Staff, Rep. Jackie Walorski                                       | Email                         | Discussion regarding potential MECEA travel to Qatar                         |
| R. Smith, Senior Policy Advisor     | Qatar   | 03/20/18           | Rep. Bradley Byrne         |  | In person                     | Discussion regarding potential MECEA travel to Qatar                         |
| R. Smith, Senior Policy Advisor     | Qatar   | 04/09/18           | Ted Maness                 | Chief of Staff, Rep. Trent Kelly   | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir      |
| R. Smith, Senior Policy Advisor     | Qatar   | 04/09/18           | Kyle Matous                | Chief of Staff, Rep. Pete Sessions   | Email                         | Discussion regarding invitation to event at US                               |

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| <i><b>Short Form Registrant</b></i> | <i><b>Foreign Principal</b></i> | <i><b>Date</b></i> | <i><b>Contact Name</b></i> | <i><b>Position</b></i>                              | <i><b>Type of Contact</b></i> | <i><b>Subject matter</b></i>   |
|-------------------------------------|---------------------------------|--------------------|----------------------------|---|-------------------------------|--|
|                                     |                                 |                    |                            |   |                               | Chamber with Qatari Emir   |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Katherine Runkle           | Scheduler, Rep. Pete Sessions                       | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Matthew Stroia             | Chief of Staff, Rep. Mike Kelly                     | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Bret Manley                | Chief of Staff, Rep. Jeff Denham                    | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Carol Kresse               | Scheduler, Rep. Jeff Denham                         | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Mark Williams              | Chief of Staff, Rep. Mike Conaway                   | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| R. Smith, Senior Policy Advisor     | Qatar                           | 04/09/18           | Caitlin Shannon            | Deputy Chief of Staff, Rep. Devin Nunes             | Email                         | Discussion regarding invitation to event at US Chamber with Qatari Emir    |
| B. Stupak, Partner                  | HKTDC                           | 2/14/18            | Ned Michalek               | Administrative Assistant to Congressman Eliot Engel | Email                         | Set meeting with Congressman Engel and Hong Kong Economic and Trade Office |

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| <i>Short Form Registrant</i> | <i>Foreign Principal</i> | <i>Date</i> | <i>Contact Name</i>     | <i>Position</i>                         | <i>Type of Contact</i> | <i>Subject matter</i>   |
|------------------------------|--------------------------|-------------|-------------------------|---|------------------------|---|
|                              |                          |             |                         |   |                        | Commissioner Clement Leung  |
| B. Stupak, Partner           | HKTDC                    | 2/15/18     | Darlene Murray          | Scheduler for Congressman Eliot Engel   | Email                  | Set meeting with Congressman Engel and Hong Kong Economic and Trade Office Commissioner Clement Leung |
| B. Stupak, Partner           | HKTDC                    | 2/20/18     | Congressman Eliot Engel | Member of U.S. House of Representatives | Meeting                | Meeting to discuss U.S.-Hong Kong relations   |
| B. Stupak, Partner           | HKTDC                    | 3/22/18     | Congressman Eliot Engel | Member of U.S. House of Representatives | Meeting                | Meeting to discuss U.S.-Hong Kong relations   |

**Response to 14(a)**

The following information may relate to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended. Further, some of the payments may relate to services performed in a prior period. Here, the Hong Kong Trade Development Council is referred to as "HKTDC," the Embassy of the State of Qatar is referred to as "Qatar," the Kili/Bikini/Ejit Local Government Council is referred to as "KBE," and the Malaysian Palm Oil Council is referred to as "MPOC."

| <i>Date</i> | <i>From Whom</i> | <i>Purpose</i>       | <i>Amount</i> | <i>Total</i>        |
|-------------|------------------|----------------------|---------------|---------------------|
| 12/04/2017  | HKTDC            | Consultancy Services | \$21,473.00   |                     |
| 01/08/2018  | HKTDC            | Consultancy Services | \$21,473.00   |                     |
| 02/12/2018  | HKTDC            | Consultancy Services | \$21,473.00   |                     |
| 03/19/2018  | HKTDC            | Consultancy Services | \$21,473.00   |                     |
| 04/18/2018  | HKTDC            | Consultancy Services | \$21,473.00   |                     |
|             |                  |                      |               | <i>\$107,365.00</i> |
| 04/02/2018  | MPOC             | Legal Services       | \$1,143.50    |                     |
| 04/20/2018  | MPOC             | Legal Services       | \$1,705.60    |                     |
|             |                  |                      |               | <i>\$2,849.00</i>   |
| 04/23/2018  | KBE              | Consultancy Services | \$11,060.50   |                     |
|             |                  |                      |               | <i>\$11,060.50</i>  |
| 2/8/2018    | Qatar            | Consultancy Services | \$150,000.00  |                     |
| 3/8/2018    | Qatar            | Consultancy Services | \$150,000.00  |                     |
| 4/6/2018    | Qatar            | Consultancy Services | \$150,000.00  |                     |



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|  |  |  |                     |                     |
|--|--|--|---------------------|---------------------|
|  |  |  |                     | <i>\$450,000.00</i> |
|  |  |  | <b>GRAND TOTAL:</b> | <b>\$571,274.50</b> |

**Response to 15(a)**

The following information may relate to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended. Further, some of the payments may relate to services performed in a prior period.

Foreign Principal: Embassy of the State of Qatar

| <i>Date</i> | <i>To Whom</i>                  | <i>Purpose</i>       | <i>Amount</i> | <i>Total</i>         |
|-------------|---------------------------------|----------------------|---------------|----------------------|
| 2/13/2018   | Husch Blackwell Strategies, LLC | Consultancy Services | \$25,000.00   |                      |
| 3/20/2018   | Husch Blackwell Strategies, LLC | Consultancy Services | \$25,000.00   |                      |
| 4/10/2018   | Husch Blackwell Strategies, LLC | Consultancy Services | \$25,000.00   |                      |
|             |                                 |                      |               | <i>\$75,000.00</i>   |
| 2/13/2018   | Iron Bridge Strategies LLC      | Consultancy Services | \$25,000.00   |                      |
| 3/13/2018   | Iron Bridge Strategies LLC      | Consultancy Services | \$25,000.00   |                      |
| 4/10/2018   | Iron Bridge Strategies LLC      | Consultancy Services | \$25,000.00   |                      |
|             |                                 |                      |               | <i>\$75,000.00</i>   |
| 2/13/2018   | Sphere Consulting               | Consultancy Services | \$40,000.00   |                      |
| 3/13/2018   | Sphere Consulting               | Consultancy Services | \$40,000.00   |                      |
| 4/10/2018   | Sphere Consulting               | Consultancy Services | \$40,000.00   |                      |
|             |                                 |                      |               | <i>\$120,000.00</i>  |
|             |                                 |                      |               | <b>GRAND TOTAL:</b>  |
|             |                                 |                      |               | <b>\$270,000.00*</b> |

\* The amount of funds received and reported on in 14(a) from the Embassy of the State of Qatar and the amount of funds disbursed and reported on behalf of the Embassy of the State of Qatar in 15(a) may not align completely because payments received or disbursed during this period may relate to services provided in prior periods or some funds received may have been held for potential future disbursements.

**Response to 15(c)**

Individuals who have filed Short-Form Registration Statements in connection with Venable LLP's registration under the Foreign Agents Registration Act made the following political contributions during

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the reporting period:

| <i><b>Date</b></i> | <i><b>Amount</b></i> | <i><b>Political Organization or Candidate</b></i>       |
|--------------------|----------------------|---|
| 11/16/2017         | \$500.00             | Rep. John Ratcliffe                                     |
| 12/30/2017         | \$1,000.00           | Sen. Dean Heller  |
| 11/13/2017         | \$50.00              | Morgan for Michigan                                     |
| 11/22/2017         | \$20.00              | VenPAC  |
| 12/22/2017         | \$20.00              | VenPAC  |
| 01/26/2018         | \$20.00              | VenPAC  |
| 02/26/2018         | \$20.00              | VenPAC  |
| 03/26/2018         | \$20.00              | VenPAC  |
| 04/26/2018         | \$20.00              | VenPAC  |
| 11/22/2017         | \$20.00              | VenPAC  |
| 12/22/2017         | \$60.00              | VenPAC  |
| 01/26/2018         | \$100.00             | VenPAC  |
| 02/26/2018         | \$100.00             | VenPAC  |
| 03/26/2018         | \$100.00             | VenPAC  |
| 04/26/2018         | \$100.00             | VenPAC  |
| 11/22/2017         | \$84.00              | VenPAC  |
| 12/22/2017         | \$84.00              | VenPAC  |
| 12/29/2017         | \$1,200.00           | VenPAC  |
| 11/22/2017         | \$125.00             | VenPAC  |
| 12/22/2017         | \$125.00             | VenPAC  |
| 01/26/2018         | \$125.00             | VenPAC  |
| 02/26/2018         | \$125.00             | VenPAC  |
| 03/26/2018         | \$125.00             | VenPAC  |
| 04/26/2018         | \$125.00             | VenPAC  |
| 11/13/2017         | \$500                | Whitehouse for Senate (Senator Sheldon Whitehouse)      |
| 11/14/2017         | \$500                | Doug Jones for Senate (Doug Jones)                      |
| 12/05/2017         | \$250                | Ami Bera for Congress (Congressman Ami Bera)            |
| 12/06/2017         | \$1,000              | Tester for Senate (Senator Jon Tester)                  |
| 02/07/2018         | \$1,000              | Feinstein for Senate (Senator Dianne Feinstein)         |
| 02/12/2018         | \$500                | Friends of Mark Warner (Senator Mark Warner)            |
| 03/06/2018         | \$1,000              | Crowley for Congress (Congressman Joe Crowley)          |
| 03/07/2018         | \$1,000              | Whitehouse for Senate (Senator Sheldon Whitehouse)      |
| 03/14/2018         | \$500                | Tina Smith for Senate (Senator Tina Smith)              |
| 03/14/2018         | \$250                | Erik Jones for Congress (Erik Jones)                    |
| 04/17/2018         | \$500                | Himes for Congress (Congressman Jim Himes)              |
| 11/22/2017         | \$100.00             | VenPAC  |
| 12/22/2017         | \$100.00             | VenPAC  |
| 01/26/2018         | \$100.00             | VenPAC  |
| 02/07/2018         | \$10,000.00          | Team Ryan (Joint Fundraising Committee; Rep. Paul Ryan) |
| 02/26/2018         | \$100.00             | VenPAC  |
| 03/26/2018         | \$100.00             | VenPAC  |
| 04/26/2018         | \$100.00             | VenPAC  |

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|            |          |        |
|------------|----------|--------|
| 01/26/2018 | \$416.66 | VenPAC |
| 02/26/2018 | \$416.66 | VenPAC |
| 03/26/2018 | \$416.66 | VenPAC |
| 04/26/2018 | \$416.66 | VenPAC |